



Privacy Impact Assessment

Animal Disease Traceability Information System (ADTIS)

Revision: 2.0

***Animal and Plant Health Inspection
Services (APHIS)/Veterinary Services
(VS)***

Date: April 2010

USDA PRIVACY IMPACT ASSESSMENT FORM**Agency: APHIS-VS****System Name: National Animal Identification System (NAIS)**

System Type: ☒ Major Application
 ☐ General Support System
 ☐ Non-major Application

System Categorization (per FIPS 199): ☐ High
 ☒ Moderate
 ☐ Low

Description of the System:

The Animal Disease Traceability Information System (ADTIS) is a co-operative State-Federal-industry partnership system designed for the purpose of standardizing and expanding animal identification (ID) programs and practices to all animals that would benefit from rapid trace backs in the event of a disease of bioterrorism concern. The goal of the ADTIS is to enable trace back of the movement of any diseased or exposed animal. This will help to ensure rapid disease containment and maximum protection of America's food and recreational animals.

The ADTIS system contains four major components; AIMS, SPIS, ATPS and the DMC (premise registration). Software has been deployed to support premises registration and animal identification management. The animal movement databases are built and managed by the private sector, but USDA uses ATPS as the necessary integration tool to interface with these private databases. Premises registration involves assigning a unique identifier to all premises in the United States (US) where livestock reside. There are in excess of two million premises in the US. Establishing the initial data store and the long-term management of the premises records is a dual partnership between USDA APHIS, States, and Native American tribes. State, Federal and private entities actively market the ADTIS program, encourage, and facilitate producers in registering their premises and getting a national premise ID.

National Premises Information Repository consists of Oracle tables that contain the list of most premises currently registered in the US. Tables only contain core data elements. Allocator is a Java 2 Platform, Enterprise Edition (J2EE) application is used to validate addresses, assign the premises ID to valid addresses, and transfer premises data between a state system and the national repository. The allocator also connects to various commercial addresses databases (i.e. US Post Office, TeleAtlas and Google) to check the validity of addresses entered by state users. The allocator is accessed via

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Application Programming Interface (API) and Web services by other internal and external modules.

The Standardized Premises Information System (SPIS) is an application offered free to states enabling them to manage their state premises registration activities. SPIS has data tables of its own, used to store data of interest to State animal health officials. SPIS communicates with the allocator when attempting to retrieve a premises ID for entered premises. SPIS is a J2EE application with an Oracle backend. The SPIS provides a common, free-for-use system for individual States to register locations (premises) for animal processing and obtain a national premises ID. The data is segregated on a State-by-State basis. The system provides separation at the State level, providing the ability for each state to manage their data independently of other States. Within each State, users will register an account (providing business information), and user contact information. Once registered, users can then register one or more premises to their account. Through the premises registration process, the system will connect to the National Premises Allocator system to generate/provide the Premises ID. In addition, the system provides various features for querying premises and account information.

The ADTIS is a USDA program intended to identify animals and track them as they come in contact with, or commingle with, animals other than herd mates from their premises of origin. The system is being developed for all animals that will benefit from rapid trace backs in the event of a disease concern.

Animal Identification Management System (AIMS) – Basic to identification is assigning and maintaining unique record of animal populations from individual birth throughout lifespan including movement between premises. The AIMS is designed to create or store the unique individual record identifier, to facilitate order and delivery of physical animal tags to premise locations, and to collect and maintain history of animal location. The AIMS system handles unique animal identification and the movement of Animal Identification Number (AIN) IDs between premises. AINM utilizes the Premises ID Allocation System to identify current and historical geographic location of individual animals to support State and Federal animal disease monitoring and surveillance programs.

The NAIS is a national program intended to identify specific animals in the US and to record their movement over their lifespan. It is being developed by the USDA and state agencies – in cooperation with industry - to enable 48-hour trace back of the movement of any diseased or exposed animal. This will help to ensure rapid disease containment and maximum protection of America's animals.

Data Management Center – the DMC is a J2EE application that was originally built to support ADTIS helpdesk personnel in researching addresses that will not validate against commercial databases, to run various reports against the national repository, and to support other access and general management of the national premises information repository. With recent security upgrades, selected state animal health officials can also have access to the DMC to perform these functions against the data for their state. The DMC interfaces with both the allocator and the national premises information repository.

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Animal Tracing Processing System - The Animal Trace Processing System (ATPS) is the application that satisfies ADTIS requirements to provide the ability for the USDA to provide a complete trace back for a diseased or suspected animal. ATPS enables this requirement by providing a web-based application that allows clients who store and maintain animal trace data (Animal Trace Database providers or ATDs) to provide this information to the USDA as it is needed. Client systems include any public or private system that stores animal movement, sighting, or event data.

ADTIS also includes several external systems and data stores including the Compliant Premises Information System (CPIS).

Who owns this system?

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Who is the security contact for this system?

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DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?

Indicate whether the following types of personal data are present in the system

QUESTION 1	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	Y	N
Social Security Number	N	N
Taxpayer Identification Number	N	N
Telephone Number	Y	N
Email address	Y	N
Street address	Y	N
Financial data	N	N
Health data	N	N
Biometric data	N	N
QUESTION 2	Y	N
Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.?		
NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code ¹		
Are social security numbers embedded in any field?	N	N
Is any portion of a social security numbers used?	N	N
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	N	N



If all of the answers in Questions 1 and 2 are NO,

You do not need to complete a Privacy Impact Assessment for this system and the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

3. No, because the system does not contain, process, or transmit personal identifying information.

¹ Comments of Latanya Sweeney, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.

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If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.

DATA COLLECTION

3. Generally describe the data to be used in the system.

The information contained in the system is based on the tracing of animals. General contact information is collected from customers; i.e., name, address, employer or company name, contact numbers, and e-mail. All other information is in regards to the animals in the possession of the customers. The information is comprised of specific data about the animals in the system. Personal information of individuals is only used for verification and contact purposes for the goal of tracing and containment of diseased or exposed animals.

4. Does the system collect Social Security Numbers (SSN) or Taxpayer Identification Numbers (TIN)?

☐ Yes

X No. If NO, go to question 5

4.1. State the law or regulation that requires the collection of this information.

5. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.

X Yes

☐ No

6. Sources of the data in the system.

6.1. What data is being collected from the customer?

General contact information is collected from customers; specifically, name, address, employer or company name, contact numbers, and e-mail. All other information is in regards to the animals in the possession of the customers and only collected during a disease or other health event. Such animal information

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collected includes: specific systems that provided the information (i.e., premises data, animal ID manufacturers, and animal tracking institutions), Premises ID, Animal ID, date of event, event type, breed and sex.

6.2. What USDA agencies are providing data for use in the system?

The USDA Forest Service provides information on range allotments.

6.3. What state and local agencies are providing data for use in the system?

State Boards of Animal Health and/or Departments of Agriculture and/or agents as assigned by the State.

States

- ☐ Alabama Department of Agriculture
- ☐ Alaska Department of Agriculture
- ☐ Arizona Department of Agriculture
- ☐ Arkansas Department of Agriculture
- ☐ Colorado Department of Agriculture
- ☐ Connecticut Department of Agriculture
- ☐ Delaware Department of Agriculture
- ☐ Florida Department of Agriculture
- ☐ Georgia Department of Agriculture
- ☐ Hawaii Department of Agriculture
- ☐ Idaho Department of Agriculture
- ☐ Illinois Department of Agriculture
- ☐ Indiana Department of Agriculture
- ☐ Iowa Department of Agriculture
- ☐ Kansas Department of Agriculture
- ☐ Kentucky Department of Agriculture
- ☐ Louisiana Department of Agriculture
- ☐ Maine Department of Agriculture
- ☐ Maryland Department of Agriculture
- ☐ Massachusetts Department of Agriculture
- ☐ Michigan Department of Agriculture
- ☐ Missouri Department of Agriculture
- ☐ Montana Department of Agriculture
- ☐ Nebraska Department of Agriculture
- ☐ New Hampshire Department of Agriculture
- ☐ New Jersey Department of Agriculture
- ☐ New Mexico Department of Agriculture
- ☐ New York Department of Agriculture
- ☐ North Carolina Department of Agriculture

- ☐ North Dakota Department of Agriculture
- ☐ Ohio Department of Agriculture
- ☐ Oklahoma Department of Agriculture
- ☐ Oregon Department of Agriculture
- ☐ Puerto Rico Department of Agriculture
- ☐ Rhode Island Department of Agriculture
- ☐ South Carolina Department of Agriculture
- ☐ South Dakota Department of Agriculture
- ☐ Tennessee Department of Agriculture
- ☐ Texas Department of Agriculture
- ☐ Vermont Department of Agriculture
- ☐ Virginia Department of Agriculture
- ☐ Washington Department of Agriculture
- ☐ West Virginia Department of Agriculture

Tribes

- ☐ Fort Belknap
- ☐ Kawerak
- ☐ Navajo Nation
- ☐ San Carlos Apache
- ☐ Walker River Paiute

Others

- ☐ Animal Health Officials

6.4. From what other third party sources is data being collected?

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Manufacturers of physical animal ID tags will provide records of shipments of Animal Identification Number (AIN) IDs from the manufacturers' premises to other non producer premises or to a producer premises.

Animal Tracking Databases (ATDs) such as Ag Info Link, Micro Beef, Global Animal Management, etc., are private organizations evaluated by USDA that provide animal tracking data during a disease or emergency event as declared by the Secretary of Agriculture.

7. Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e. NFC, RD, etc.) or Non-USDA sources.

☒ Yes

☐ No. If NO, go to question 7

- 7.1. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

Data collected in the system is verified by the State AHOs or their agents. NAIS currently requires all premises addresses to be validated by one of three databases (ZP4, Tele Atlas, or Google) or go through the exception process. The exception process is a published Standard of Procedure (SOP) that is designed to verify driving directions (using an electronic map) and insuring they match with the provided Global Positioning Satellite (GPS) coordinates.

- 7.2. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

The system will not allow the submission of data unless it is complete and verified. State AHOs must verify the information prior to entering the data into the system. The system will not allow the data to be stored without providing all the required data.

- 7.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

Data is collected from States, Tribes, AHOs, and ID tag manufacturers. ATDs provide data during a foreign animal disease, emergency, or program disease event. The accuracy of Premises Identification numbers (PINs) and AINs are checked within the system by correlating the issued numbers and the associated event data in the ATPS, with the numbers and associated tag data in AINM. Exception reports are generated if there is data that contradicts the completeness of existing information in the system.

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DATA USE

8. Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?

The information collected on individuals is in relation to the tracing of animals, the location of animals currently in their possession and the history of locations for those animals and animals that may have been co-mingled with the animal of interest.

9. Will the data be used for any other purpose?

☐ Yes

X No. If NO, go to question 10

9.1. What are the other purposes?

10. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President

X Yes

☐ No

11. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e. aggregating farm loans by zip codes in which only one farm exists.)?

☐ Yes

X No. If NO, go to question 12

- 11.1. Will the new data be placed in the individual's record (customer or employee)?

☐ Yes

☐ No

- 11.2. Can the system make determinations about customers or employees that would not be possible without the new data?

☐ Yes

☐ No

- 11.3. How will the new data be verified for relevance and accuracy?

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12. Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?

(1) Information is used by Federal and State animal health officials during a foreign animal disease (FAD) outbreak, bioterrorism, or other animal health emergency to contain and respond to the emergency event. Specifically, the information aids in the traceback and or trace forward of exposed and potentially exposed animals.

(2) Information will be referred to the appropriate agency, whether Federal, State, local, or foreign, charged with the responsibility of investigating or prosecuting a violation of law or enforcing or implementing a statute, rule, regulation or order issued pursuant thereto, of any record within this system when information available indicates a violation or potential violation of law, whether civil, criminal or regulatory in nature, and whether arising by general statute or particular program statute, or by rule, regulation or order issued pursuant thereto.

(3) Information will be disclosed to the Department of Justice for use in litigation when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the Department of Justice has agreed to represent the employee, or the United States, where the agency determined that litigation is likely to affect the agency or any of its components, is a party to litigation or has an interest in such litigation, and the use of such records by the department of Justice is deemed by the agency to be relevant and necessary to the litigation; provided, however, that in each case, the agency determined that disclosure of the records to the Department of Justice is a use of the information contained in the records that is compatible with the purpose for which the records were collected.

(4) Information will be disclosed in a proceeding before a court or adjudicative body before which the agency is authorized to appear, when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee, or the United States, where the agency determines that litigation is likely to affect the agency or any of its components, is a party to litigation or has an interest in such litigation, and the agency determines that use of such records is relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the court is a use of the information contained in the records that is compatible with the purpose for which the records were collected.

(5) Information will be disseminated to solicit feedback from federal and state animal health officials within the system on emergency preparedness guidelines and the system itself for the purpose of educating and involving the federal and state animal health officials in program development, program requirements, and standards of conduct.

13. Will the data be used for any other uses (routine or otherwise)?

☐ Yes

X No. If NO, go to question 14

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13.1. What are the other uses?

14. Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?

☒ Yes

☐ No. If NO, go to question 15

14.1. What controls are in place to protect the data and prevent unauthorized access?

Appropriate Level 2 eAuthentication logon credentials by users are used to gain access to the system. This access is monitored by USDA officials to ensure authorized and appropriate use of data. Additionally, user roles are established to ensure users have access to certain types of data based on their roles and need to access certain types of data in this system.

15. Are processes being consolidated?

☒ Yes

☐ No. If NO, go to question 16

15.1. What controls are in place to protect the data and prevent unauthorized access?

Appropriate Level 2 eAuthentication logon credentials by users are necessary to gain access to the system. This access is monitored by USDA officials for proper usage.

DATA RETENTION

16. Is the data periodically purged from the system?

☐ Yes

☒ No. If NO, go to question 17

16.1. How long is the data retained whether it is on paper, electronically, in the system or in a backup?

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16.2. What are the procedures for purging the data at the end of the retention period?

16.3. Where are these procedures documented?

17. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

The data is monitored by the USDA ADTIS team. Because of the constant change and update of information, the data is continuously monitored by system users who regularly review the data by running reports and queries. This type of review and monitoring ensures the information in the system is accurate and up to date.

18. Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

☒ Yes

☐ No

DATA SHARING

19. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

☒ Yes

☐ No. If NO, go to question 20

19.1. How will the data be used by the other agency?

State Animal Health Officials, as noted in response to question 5.3, will have access to the data for the purpose of tracing animals upon three identified triggering events: (1) presumptive positive test for foreign animal disease, (2) presumptive positive test for program disease, or (3) declared emergency by the Secretary of Agriculture.

19.2. Who is responsible for assuring the other agency properly uses of the data?

The USDA APHIS Veterinary Services Deputy Administrator maintains responsibility for the assuring proper use of the data through written agreements, such as Memoranda of Understanding, Interconnectivity Agreements, and Cooperative Agreements.

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20. Is the data transmitted to another agency or an independent site?

- ☐ Yes
X No. If NO, go to question 21

20.1. Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

21. Is the system operated in more than one site?

- ☐ Yes
X No. If NO, go to question 22

21.1. How will consistent use of the system and data be maintained in all sites?

DATA ACCESS

22. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?

- USDA Personnel: The only members with direct access to the system will be those internal to APHIS who have been granted access to the system. These will include System Administrators and Database Administrators, in addition to assigned APHIS personnel responsible for auditing and querying data in the application.
- External users include State veterinarians and AHOs as identified in the response to question 5.3 above.

23. How will user access to the data be determined?

Access to the system and data is based on the role of the user. Each user is given permissions based on the need to obtain or update the information.

23.1. Are criteria, procedures, controls, and responsibilities regarding user access documented?

- X Yes
☐ No

Note: The criteria, procedures, controls and responsibilities regarding user access are identified in the Allocator, AINM, ATPS, DMC, and SPRS Technical Requirements documents.

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24. How will user access to the data be restricted?

User access is restricted within the system to relevant data. The primary implementation is through assignment of roles to user accounts. Each role is mapped to a collection of permissions to access system data and functionality. Administrative roles have the broadest access to system data. A user may be restricted to the information only pertaining to their particular state while others may have access to multiple sets of data.

24.1. Are procedures in place to detect or deter browsing or unauthorized user access?

☒ Yes
☐ No

Note: Procedures to detect/deter browsing and unauthorized user access are identified in the General Application Technical Requirements document.

25. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

☒ Yes
☐ No

CUSTOMER PROTECTION

26. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e. office, person, departmental position, etc.)?

USDA APHIS and the ADTIS Management Team are all responsible for protecting the privacy rights of the customers and employees identified in the ADTIS as required by applicable State and Federal laws..

27. How can customers and employees contact the office or person responsible for protecting their privacy rights?

Any individual customer or employee may obtain information from a record in the system that pertains to him or her.

Requests for hard copies of records should be in writing, and the request must contain the requesting individual's name, address, name of the system of records, timeframe for the records in question, any other pertinent information to help identify the file, and a copy of his/her photo identification containing a current address for verification of identification. All inquiries should be addressed to the Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232.

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28. A “breach” refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?

☒ Yes. If YES, go to question 29

☐ No

28.1. If NO, please enter the POAM number with the estimated completion date:

29. Consider the following:

- Consolidation and linkage of files and systems
- Derivation of data
- Accelerated information processing and decision making
- Use of new technologies

Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?

☐ Yes

☒ No. If NO, go to question 29

29.1. Explain how this will be mitigated?

30. How will the system and its use ensure equitable treatment of customers?

31. Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

☐ Yes

☒ No. If NO, go to question 32

31.1. Explain

SYSTEM OF RECORD

32. Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?

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☒ Yes

☐ No. If NO, go to question 32

32.1. How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

Data can be retrieved by animal 10, premises 10, premises address, and premises contact name.

32.2. Under which Systems of Record notice (SOR) does the system operate?

Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov)

The System of Records Notice (SORN) is pending publication.

32.3. If the system is being modified, will the SOR require amendment or revision?

No because the SORN is currently being developed for publication. Any existing modifications will be included in the initial publication of the SORN. Future modifications of the system will result in an analysis of the SORN to determine whether revision of the SORN is necessary.

TECHNOLOGY

33. Is the system using technologies in ways not previously employed by the agency (e.g. Caller-ID)?

☐ Yes

☒ No. If NO, the questionnaire is complete.

33.1. How does the use of this technology affect customer privacy?

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO
THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Animal Disease Traceability Information System
(System Name)

This document has been completed in accordance with the requirements of the
EGovernment Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to
proceed. Based on our authority and judgment, the continued operation of this system is
authorized.

System Manager/Owner
OR Project Representative
OR Program/Office Head.

Date

Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

Date

Agency OCIO

Date

Agency ISSPM

Date